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RECENT CASES.

INJUNCTIONS.

Injunction.—*Belknap et al. v. Schield*, 16 Supreme Court Rep. 443. An injunction cannot issue to restrain United States officers from using an article made by them in infringement of patent, when such article is in the possession of and used for the benefit of the United States.

Injunction—Action on Bond—Damages—Interest.—*Belmont Mining & Milling Co. et al. v. Costigan et al.*, 42 Pac. Rep. 650 (Col.). When the sale of land under a trust deed is delayed by a temporary injunction, and upon subsequent sale it fails to bring enough to pay the secured debt, an element of damage is the difference between the amount actually received and what would have been probably realized if the injunction had not been granted, but interest upon the amount of the debt during the time of the delay should not be awarded.

Injunction—Damages—Attorney Fees.—*Creek v. McManus et al.*, 43 Pac. Rep. 497 (Mont.) This was a suit for damages on an injunction bond, in which the plaintiff sought to recover, as one item of damages, fees paid to an attorney who resisted the injunction and tried the case on its merits. But the court held that, since the attorney was employed generally, fees could not be recovered as damages.

INSURANCE.

Action on Life Insurance Policy—Evidence—Appeal—Harmless Error—Estoppel.—*Mullen v. Mutual Life Insurance Co.*, 32 S. W. Rep. 911 (Tex.). Where, as required by law, a notice is sent to plaintiff and his wife on whose lives a life policy has been issued, stating the premiums due and that the policy would be forfeited for non-payment, the plaintiff cannot avail himself of his failure to deliver the notice to his wife and claim that the policy was not forfeited because she had not received notice.